

FILED

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U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

ALEXANDRIA COLLINS,

Defendant.

4:18CR00811 SNLJ/NCC

No.

INDICTMENT

The Grand Jury charges:

COUNT 1

(Interstate Transportation of Stolen Vehicle)

On or about October 5, 2016, within the Eastern District of Missouri, the defendant

ALEXANDRIA COLLINS,

did unlawfully transport in interstate commerce a stolen motor vehicle, that is, a 2015 Chevrolet Camaro with a vehicle identification number ending in 1768, with a value exceeding \$29,000.00, from the State of Illinois to the State of Missouri, knowing the same to be stolen, in that the defendant fraudulently used the name of N.M. and the social security number of a minor child in purchasing the vehicle from a car dealership in O'Fallon, Illinois.

In violation of Title 18, United States Code, Section 2312.

COUNT 2

(Social Security Fraud)

On or about November 23, 2016, within the Eastern District of Missouri, the defendant,

ALEXANDRIA COLLINS,

in a matter within the jurisdiction of the United States Social Security Administration, for the purpose of obtaining something of value and for other purposes, knowingly, and with the intent to deceive, falsely represented to a motor vehicle title loan company that the social security number of a minor child had been issued to N.M. so defendant could obtain a motor vehicle title loan in the amount of \$10,013.50 secured through the pledge of a 2015 Chevrolet Camaro with a vehicle identification number ending in 1768.

In violation of Title 42, United States Code, Section 408(a)(7)(B).

COUNT 3

(Mail Fraud)

A. The Scheme to Defraud

1. Between on or about November 23, 2016 and continuing to on or about December 16, 2016, in the Eastern District of Missouri and elsewhere, the defendant,

ALEXANDRIA COLLINS,

did devise, and intend to devise, a scheme and artifice to defraud the State of Missouri, individuals, and motor vehicle title lenders, by means of materially false and fraudulent pretenses, representations and promises that the loan applications and supporting loan documentation was accurate.

2. It was part of the scheme and artifice to defraud that:

- a. Through use of N.M.'s name and the social security number of a minor, defendant financed the purchase of a 2015 Chevrolet Camaro with a vehicle identification number ending in 1768 from CarMax in O'Fallon, Illinois.
- b. Although CarMax provided defendant with an application for a certificate of title which listed itself as the lienholder, defendant submitted a fraudulent application in which she claimed that N.M. was the vehicle's owner, and there was no lienholder.
- c. Pursuant to the fraudulent application, the State of Missouri Department of Revenue issued a Certificate of Title for the 2015 Chevrolet Camaro without listing a lienholder.
- d. The defendant used the name of N.M. and the social security number of a minor in applying for a motor vehicle title loan TitleMax of Missouri, a title loan lender doing business in the Eastern District of Missouri.
- e. In the loan application, defendant misrepresented that she was employed by Privilege Banquet Hall as an event planner, and earned \$2,100.00 every two weeks.
- f. To give the impression that she owned the vehicle without any encumbrances, defendant presented to TitleMax of Missouri the fraudulently obtained Certificate of Title.
- g. Accepting the representations as true, TitleMax of Missouri approved the loan, and applied for a Certificate of Title from the State of Missouri listing itself as the lienholder.

h. The State of Missouri accepted the application and issued a Certificate of Title that listed the owner of the vehicle as N.M. and TitleMax of Missouri as the first lienholder.

B. The Mailing

On or about December 16, 2016, in the Eastern District of Missouri, the defendant,

ALEXANDRIA COLLINS,

for the purpose of executing the above-described scheme to defraud, did knowingly cause the deposit of an envelope containing a false and fraudulent State of Missouri Certificate of Title listing the owner of a 2015 Chevrolet Camaro with the vehicle identification number ending in 1768 as being N.M., and the lienholder being TitleMax of Missouri which was sent and delivered by the United States Postal Service from the State of Missouri Department of Revenue in Jefferson City, Missouri to TitleMax of Missouri, 2629 Gravois Avenue, Saint Louis, Missouri 63118.

In violation of Title 18, United States Code, Section 1341.

COUNT 4

(Aggravated Identity Theft)

On or about the November 23, 2016, in the Eastern District of Missouri, the defendant,

ALEXANDRIA COLLINS,

did knowingly transfer, possess, and use, without lawful authority, a means of identification of another person, to wit, the name of N.M, during and in relation to the commission of the felony offenses of: mail fraud, Title 18, United States Code, Section 1341; wire fraud, Title 18, United

States Code, Section 1343; and, social security fraud, Title 42, United States Code, Section 408(a)(7)(B).

In violation of Title 18, United States Code, Sections 1028A and 2.

COUNT 5

(Interstate Transportation of a Stolen Vehicle)

On or about January 7, 2017, within the Eastern District of Missouri, the defendant

ALEXANDRIA COLLINS,

and persons unknown to the Grand Jury, did unlawfully transport in interstate commerce a stolen motor vehicle, that is, a 2015 Chevrolet Camaro with a vehicle identification number ending in 1768, with a value exceeding \$29,000.00, from the State of Missouri to the State of Illinois, so that the vehicle could be sold for \$14,000.00 to a resident of the State of Indiana. Prior to the interstate transportation, defendant and persons unknown to the Grand Jury knew the vehicle to be stolen because the State of Missouri Certificate of Title presented to the Indiana purchaser was counterfeit.

In violation of Title 18, United States Code, Sections 2312 and 2.

COUNT 6

(Interstate Transportation of a Stolen Vehicle)

On or about April 26, 2017, within the Eastern District of Missouri, the defendant

ALEXANDRIA COLLINS,

did unlawfully transport in interstate commerce a stolen motor vehicle, that is, a 2015 Chevrolet Camaro with a vehicle identification number ending in 1768, with a value exceeding \$10,000.00, from the State of Indiana to the State of Missouri, knowing the same to be stolen, in that the defendant and persons unknown to the Grand Jury had fraudulently sold the vehicle to a resident of the State of Indiana before it was stolen from the Indiana resident on or about February 27, 2017.

In violation of Title 18, United States Code, Section 2312 and 2.

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FOREPERSON

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